

JOHN ASHCROFT  
Governor

G. TRACY MEHAN III  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office  
8460 Watson Road, Suite 217  
St. Louis, MO 63119  
314-849-1313

*C.D. / WMP Nov recorded*  
Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

July 7, 1989

Mr. Ray Phegley  
Safety/Security Director  
Gusdorf Corporation  
11440 Lackland Road  
St. Louis, Mo. 63146

L.O.W. #89-

**RECEIVED**  
JUL 11 1989

WASTE MANAGEMENT  
PROGRAM

Dear Mr. Phegley:

Enclosed, please find a report of an inspection conducted by Mr. Kerwin Singleton of my staff. The section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection. The "RECOMMENDATIONS" outline the steps the inspector has determined will correct those violations.

A review of your company's June 28, 1989 response to Notice of Violation #1544 indicates that additional corrective steps are required. In order to document that corrective steps have been taken, you are requested to submit a written response by August 10, 1989.

The response should include the following; an approximate date for the construction of a containment system. Also inform the department of the installation date for the containment system. Certify that the storage tank in the finishing department has been emptied and filled with concrete. Also address Unsatisfactory Feature #7 in the report.

Direct the response to my attention. You should also forward a copy of your response and supporting documentation to Ms. Sandra Carrol, Chief - Hazardous Waste Enforcement, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102



R00325135  
RCRA RECORDS CENTER

(2)

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution of violations may result in the referral of this case for enforcement action by the Waste Management Program.

Should you have any questions, or wish to confer in this matter, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Mike Struckhoff". The signature is written in dark ink and is positioned above the typed name.

Mike Struckhoff  
Chief, Hazardous Waste Management Unit

MS/cj

Enclosure

✓cc: CO - WMP

**HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT**

**FACILITY**

Gusdorf Corporation  
11440 Lackland Road  
St. Louis, MO 63146  
314/567-5249

MO Gen I.D.#: 003306  
EPA I.D.#: MOD006271852

**INTRODUCTION**

An inspection of the Gusdorf Corporation (St. Louis County) was conducted on June 16, 1989, to assess compliance with the applicable rules and regulations of the Resource Conservation and Recovery Act (RCRA) and the MO Hazardous Waste Management Law. Those persons participating in the inspection were:

Kerwin C. Singleton, Environmental Engineer, MO Department of  
Natural Resources, St. Louis Regional Office  
Mr. Raymond Phegley, Safety & Security Director, and  
Mr. Vern A. Bollman, Director of Human Resources, Gusdorf Corporation.

The Gusdorf Corporation manufactures ready-to-assemble wood furniture for electronic equipment, such as television and microwave oven stands. The Lackland Road operation is the primary manufacturing facility and has been at this location since 1977.

Wastes are generated from the laminating department (corrosive adhesives), the finishing room (paint related materials), parts cleaners (petroleum naphtha), the disposal of miscellaneous off-spec materials, and from the vehicle service center (waste oil).

The inspection consisted of an initial meeting with Messrs. Phegley and Bollman, a tour of the facility and a review of the pertinent records.

The facility is subject to the land disposal restriction regulations of 40 CFR Part 268.

**UNSATISFACTORY FEATURES**

1. Containers of liquid wastes were not stored within a containment system, in violation of 10 CSR 25-5.262(2)(C)2.B.
2. Several containers were not labeled per DOT Regulations during on-site storage, others were not marked with dates of accumulation, in violation of 10 CSR 25-5.262(2)(C)1.
3. Copies of land disposal restriction notifications were not maintained, in violation of 40 CFR 268-7(a)(1),
4. The hazardous waste storage tank has not been assessed or inspected as required by 40 CFR 265 Subpart J.

5. Some manifests did not use EPA waste codes or list the quantity shipped, in violation of 10 CSR 25-5.262(2)(B).

NOV #1544 was issued at the end of the inspection, listing the above violations.

6. There were more than 55 gallons of waste in a satellite storage area, in violation of 40 CFR 262.34(c).
7. The contingency plan did not list the description and locations of spill control equipment, and did not include detailed response procedures in the event of a spill in violation of 40 CFR 265.52 & .56, respectively.
8. Wastes had been stored over 90 days, in violation of 40 CFR 262.34.

#### COMMENTS

In the finishing room, shop rags are soiled from wiping excess stain off boards. When questioned regarding the disposition of the rags, Mr. Phegley stated that they were soaked in drums of water overnight to reduce the risk of fire, and the rags are then sent out for cleaning. The wastewater is taken to the paint storage room and emptied into a trough, which is connected (by underground piping) to a 750 gallon concrete tank. A manhole to this underground tank is located in the finishing room. According to Mr. Phegley, this tank is emptied approximately once every year.

A hazardous waste storage area is located in a loading dock corridor next to the finishing room. This area contained a total of thirty-four (34) drums of waste corrosive laminating adhesive, solids and liquids. Mr. Phegley stated that the adhesive contains maleic anhydride. This storage area has not been equipped with a waste confinement system; any spills would flow toward and under the loading dock door, the door to the finishing room, or the door to the paint storage room.

The floor of the paint storage room is sloped toward a grated trough in the center of the room, which, as previously described, is connected to the 750 gallon underground storage tank. Five drums of waste paint related materials (F002) were being stored in this room.

There is an outside staging/storage area, where partially filled drums of waste are stored for consolidation. Several of the drums contained material which had not yet been classified as hazardous waste, including adhesives which may be strained and reused, stains which have set and may be sent back to the supplier for regrinding, and an unknown acid. At least two drums of waste did not have accumulation dates or labels, and one hazardous waste label was not marked with an accumulation start date. Approximately sixty (60) 55-gallon drums and two 5-gallon buckets were in this storage area, including laminating waste and paint waste.

Waste oils from the vehicle service center are stored inside this facility in a 250 gallon above ground storage tank.

There were four drums of laminating waste in satellite storage near the laminating machine.

A review of the facility's contingency plan revealed that Mr. Phegley was the emergency coordinator. The plan did not list the description and locations of spill control equipment, nor did it include detailed response procedures in the event of a spill. Spill control procedures for the laminating area were included in that portion of the training plan (for the laminating machine). It was pointed out to facility representatives that part of the waste handling procedures needed changing in that employees must be instructed to label and date drums upon initial waste accumulation.

Mr. Phegley explained that the underground storage tank is constructed of concrete, and is cleaned out once a year. The liquid from soaking shop rags is shipped off-site as a hazardous waste (paint related material). Mr. Phegley was unable to find the most recent waste analysis data. The tank has been in service since approximately 1982. The tank volume is not inspected daily, and records of inspections are not maintained. According to Mr. Phegley, a visual inspection was conducted after the last cleanout, and the tank appeared to be sound.

A review of the facility's manifests revealed that not all were properly completed. Manifests #0005, dated April 30, 1988, listed drums of waste adhesive liquids and solids without EPA waste codes. This shipment was manifested to United Solvent Services, Kansas City, MO. It was also noted that different numbering sequences were used for each off-site TSD facility.

Copies of land disposal restriction (LDR) notifications were not kept with the affected manifests. Mr. Phegley stated that he did complete the forms, but did not keep copies.

#### RECOMMENDATIONS

1. Construct containment systems for the hazardous waste storage areas satisfying the requirements of 10 CSR 25-5.262(2)(C)2.B.
2. Be certain that all containers in storage are properly labeled and marked with dates of accumulation.
3. Copies of LDR notifications must be kept at the facility for 5 years. If notifications were sent with shipments of F-solvents, contact the off-site ISD's for copies, and submit copies of the notifications to this office.
4. If the facility wishes to continue using the underground tank for the storage of hazardous waste, the facility must certify that the tank and associated equipment satisfy the requirements of 40 CFR Part 265, Subpart J. If not, a closure plan must be submitted to the Department for approval.
5. Be certain that all future manifests are complete and accurate.
6. Do not store more than 55 gallons of waste in satellite storage areas. Any excess quantity of waste must be removed from satellite storage within three days.

7. Include the description, capabilities, and locations of spill control equipment in the contingency plan, as well as detailed descriptions of standard responses to hazardous waste spills.
8. Do not store hazardous wastes on-site for longer than 90 days (in the underground storage tank).

Should you have any questions regarding this report, please feel free to contact the St. Louis Regional Office.

APPROVED BY:



F. Donald Madden  
Regional Administrator  
St. Louis Regional Office

6/26/89  
DATE

PREPARED BY:



Kerwin C. Singleton  
Environmental Engineer  
St. Louis Regional Office

26 June 89  
DATE

FDM/KCS/dlw

Enclosure

cc: Central Office - WMP

## LARGE QUANTITY GENERATOR CHECKLIST

Form LQG-INSP  
(10-15-88)Name of Facility: GILBERT COOPDate: 16 JUNE 89Address: 11440 LACKLAND RD  
ST. LOUIS, MO 63146Other Inspections Done:  
RR ☐ TRANS ☐ LDR ☒  
OTHER ☐Phone: (314) 567-5249 MO ID# 003306EPA ID# MO D006271852Facility Representative: Raymond P. HickeyTitle: Safety & Security Dir

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

MFR OF READY-TO-ASSEMBLE WOODEN ELECTRONIC FURNITURE

List of wastes generated. (Use continuation sheet, if needed.)

Waste	Amount/Month	Disposition
1. <u>WASTE PETROLEUM NAPHTHA</u>		<u>RR - Safety KERN</u>
2. <u>WASTE ADHESIVES</u>	<u>- 20 DR/MO</u>	<u>UNITED SOLV. SERVICES</u>
3. <u>PAINT RELATED MATLS</u>	<u>30-50 GAL/MO</u>	<u>" " "</u>
4. _____	_____	_____
5. _____	_____	_____

## A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(2)(B) AND (D)

Generator's MO and EPA I.D. Numbers. ☒

Manifest document number (MO I.D. & Shipment #). OUT OF SEQUENCE ☒

EPA Waste I.D. codes ☒

Generator's name, address, phone # ☒

All Transporters' names, phone #'s, MO and EPA I.D. #'s. ☒

Designated facility name, address, phone # and MO and EPA I.D. # ☒

Proper DOT Shipping Name, Hazard Class and I.D. #. ☒

Containers, Quantity and Unit Wt/Vol being shipped properly designated. ☒

Proper certification including waste minimization. ☒

Manifest properly signed and dated ☒

No more than 10 days time between generator and facility signatures. ☒

Manifests returned within 35 days. ☒

If not, exception generator report submitted within 45 days. N/A ☒

Completed manifests and Summary Manifest Report and Certification. ☒

Spills of reportable quantities reported to DNR. N/A ☒

## B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(2)(C)1

Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport. ☒

Placards available for use by transporters ☒

Satellite accumulation requirements met (if applicable). ☒

a. Stored in satellite areas less than 1 year. ☒

b. Containers marked identifying contents and beginning date ☒

c. Containers kept closed/compatible/good condition. ☒

d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely hg. waste). ☒

## C. STORAGE STANDARDS 10 CSR 25-5.262(2) AND 5.262(2)(C)2 AND 3

Facility inspected and maintained. ☒

Date of accumulation marked. ☒

Storage less than 90 days (unless small quantity generator). ☒

## D. CONTAINER STORAGE 10 CSR 25-5.262(2) AND 5.262(2)(C)2

Containers in good condition ☒

Containers kept closed in storage. ☒

Containers storing incompatible waste separated or protected from each other. ☒

Containers of ignitable or reactive waste stored > 50 feet from property line ☒

Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(2)(C)2.B. ☒

E. STORAGE TANKS 10 CSR 25-5.262(2) AND 5.262(2)(C)2.C.  
(See tank checklist)

F. PERSONNEL TRAINING 10 CSR 25-5.262(2)

Documentation of hazardous waste director's qualifications or training. (✓)  
Completed classroom or on-the-job training. . . . . (✓)  
Job title, description, and name of person filling position . . . . . (✓)  
Written record of the type and amount of training given . . . . . (✓)  
Documentation confirming that training has been given . . . . . (✓)

G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(2) AND 5.262(2)(C)2.E.

Internal communication or alarm system. . . . . ( )  
Device in the hazardous waste operation area capable of summoning emergency assistance. . . . . ( )  
Fire control, spill control, and decontamination equipment available. . . . . (✓)  
Adequate water supply for fire control equipment. . . . . (✓)  
Adequate and proper safety equipment available. . . . . (✓)  
Adequate aisle space. . . . . (✓)  
Arrangements with local emergency agencies. . . . . (✓)

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(2)

Contingency Plan. . . . . (✓)  
Detailed description of procedures that personnel must implement to respond to fires, explosions, or releases of hazardous waste. . . . . (✓)  
Describe formal arrangements with emergency agencies. . . . . (✓)  
Name, addresses, and phone numbers (home & office) of emergency coordinators. . . . . (✓)  
Emergency equipment including its description and location. . . . . (✓)  
Evacuation plan if applicable . . . . . (✓)

I. WASTE OIL 10 CSR 25-11.010

Written waste oil contract maintained . . . . . (✓)  
Waste oil properly stored and transported . . . . . (✓)

COMMENTS: g aisle space questionable in storage area  
next to Finishing Room

Inspector Signature & Title: [Signature]  
Office: SRD

IN COMPLIANCE (✓)  
IN VIOLATION OR  
ABSENT ( )



Inspector: Kenneth C. Singleton  
Address: 3460 Watson Rd  
St Louis, MO 63119  
Telephone No: 314/849-1313

RCRA LAND DISPOSAL RESTRICTION  
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name GUSDORE CORP B. Street (or other identifier) 11440 LACKLAND RD  
C. City ST LOUIS D. State MO E. Zip Code 63146 F. County Name ST LOUIS  
G. Nature of Business; Identification of Operations: SIC Code(s) MFG OF ELECTRONIC FURNITURE 7511  
H. EPA ID # MO D00627-185-2  
I. Handler Contact (Name and Phone Number) RAYMOND PHEGLEY 314/567-5249

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) F001, F002, F004, or F005 Yes ☒ No

(ii) F003 ☒ Yes No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

Yes No

b. Source of the above: Form 8700-12 ☒; Part A     ; Part B     ; Biennial/Annual Reports      other (specify)     

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: GUSDORF CORP  
ID Number: MO0000271852  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Dioxin wastes

- a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ☐ Yes ☒ No  
(ii) F028 ☐ Yes ☒ No

[F-solvent BDAT standards are presented as Appendix B]

3. California Waste Identification

- a. Does the facility handle any of the following wastes?

(i) D002 ☒ Yes ☐ No  
(ii) D004 - D011 ☒ Yes ☐ No

- b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ☒ Yes ☐ No

[California waste standards are presented as Appendix C]

- c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. ☐ Yes ☒ No

- d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]? ☐ Yes ☒ No\*

- e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ☐ Yes ☐ No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?

☐ Yes ☐ No

*intermittently, off-spec products*

*no data available*

2/ A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

- f. Source of the above: Form 8700-12 \_\_\_\_\_; Part A \_\_\_\_\_; Part B \_\_\_\_\_; Biennial/Annual Report \_\_\_\_\_; other (specify) \_\_\_\_\_.

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here: ND

\_\_\_\_\_  
\_\_\_\_\_

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes: ND

\_\_\_\_\_  
\_\_\_\_\_

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? ☐ Yes ☐ No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? ☐ Yes ☐ No\*

- e. Source of the above: Form 8700-12 \_\_\_\_\_; Part A \_\_\_\_\_; Part B \_\_\_\_\_; Biennial/Annual Report \_\_\_\_\_; other (specify) \_\_\_\_\_.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ☐ Yes ☒ No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ☐ Yes ☐ No\*

2/ A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

3. F Solvents - -

- a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)? *NO DATA AVAILABLE*
- ☒ Yes ☐ No\*

4. California Wastes

- a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]? *N/A*
- ☐ Yes ☐ No\*

5. First Third Wastes

- a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?
- ☐ Yes ☒ No\*

- b. Does the facility handle K061 wastes?
- ☐ Yes ☒ No

If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (≥15% Zn) [§268.7(a)] [§268.41(a)]?

☐ Yes ☐ No\*

- c. Does the facility handle K101 or K102 wastes?
- ☐ Yes ☒ No

If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?

☐ Yes ☐ No\*

- d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?
- ☐ Yes ☒ No

2/ A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes \_\_\_\_\_ Yes \_\_\_\_\_ No

- (i) List wastes for which "applied knowledge" was used:

\_\_\_\_\_  
\_\_\_\_\_

b. TCLP \_\_\_\_\_ Yes \_\_\_\_\_ No

- (i) List wastes for which "TCLP" was used:

\_\_\_\_\_  
\_\_\_\_\_

- (ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, list: \_\_\_\_\_  
\_\_\_\_\_

c. Total waste analysis \_\_\_\_\_ Yes \_\_\_\_\_ No

- d. If files were retained, describe content and basis of applied knowledge determination:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: \_\_\_\_\_

Note which wastes were subjected to which tests:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) \_\_\_\_\_

2/ A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

- e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]?  
\_\_\_\_ Yes \_\_\_\_ No\*

2. Did the restricted wastes exceed applicable treatment group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: PAINT RELATED MATS,

List those that did not exceed standards: \_\_\_\_\_

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] \_\_\_\_ Yes\* \_\_\_\_ No

D. Management

1. Onsite management

- a. Were restricted wastes managed onsite? \_\_\_\_ Yes \_\_\_\_ No

If no, go to "2".

- b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted? \_\_\_\_ Yes \_\_\_\_ No

If yes, TSDP checklist must be completed.

2. Offsite Management

- a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? \_\_\_\_ Yes \_\_\_\_ No\*

(ii) Corresponding treatment standard? \_\_\_\_ Yes \_\_\_\_ No\*

(iii) Manifest number? \_\_\_\_ Yes \_\_\_\_ No\*

(iv) Waste analysis, if available? \_\_\_\_ Yes \_\_\_\_ No

*copies not maintained*

✓ A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

Identify offsite treatment facilities UNITED SOLVENT  
SERVICES

- b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:
- (i) EPA hazardous waste I.D. number? ☐ Yes ☐ No\*
  - (ii) Corresponding treatment standard? ☐ Yes ☐ No\*
  - (iii) Manifest number ☐ Yes ☐ No\*
  - (iv) Certification regarding waste and that it meets treatment standards? ☐ Yes ☐ No\*

Identify land disposal facilities receiving the BDAT certified wastes \_\_\_\_\_

- c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? ☐ Yes ☐ No\*
- (ii) Corresponding Treatment Standards? ☐ Yes ☐ No\*
- (iii) All applicable prohibitions? ☐ Yes ☐ No\*
- (iv) The manifest number? ☐ Yes ☐ No\*
- (v) The date the wastes are subject to prohibitions? ☐ Yes ☐ No\*
- (vi) Does generator keep records of all notifications/certifications sent to offsite facilities? ☐ Yes ☐ No\*

2/ A potential violation is indicated

Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

List all prohibited wastes for which records  
are not provided per above [§268.7(a)(b)]:

\_\_\_\_\_

\_\_\_\_\_

Identify TSDPs receiving any prohibited wastes  
subject to any exemptions and variances:

\_\_\_\_\_

\_\_\_\_\_

- d. If handler generates a "soft hammer" waste,  
does the generator send with each "soft hammer"  
waste shipment to a TSDP and retain copies of,  
a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number? ☐ Yes ☐ No\*

Applicable prohibitions? ☐ Yes ☐ No\*

The manifest number? ☐ Yes ☐ No\*

Waste analysis data, where available?  
☐ Yes ☐ No

- (i) Do the generator's records indicate that  
any soft-hammer wastes are destined for  
disposed in a landfill or surface  
impoundment [§268.33(f)]? ☐ Yes ☐ No

If yes, list facility of destination and  
waste of concern [§268.8(a)(2)]

\_\_\_\_\_

\_\_\_\_\_

- (ii) Has the generator submitted demonstra-  
tions and certifications for each  
"soft-hammered" waste destined to be  
disposed in landfill or surface impound-  
ment to the Regional Administrator prior  
to the shipment of waste to the TSDP  
[§268.7(a)(2)]? ☐ Yes ☐ No\*

- (iii) Has the generator retained a copy of the  
demonstration on site [§268.8(a)(3)-  
(a)(4)]? ☐ Yes ☐ No\*

- (iv) Has the generator retained copies of all  
§268.8 certifications sent to the TSDP  
[§268.7(a)(6)] ☐ Yes ☐ No\*

2/ A potential violation is indicated



Handler Name: \_\_\_\_\_  
ID Number: \_\_\_\_\_  
Inspector: \_\_\_\_\_  
Date: \_\_\_\_\_

Comments

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No\*
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? ☐ Yes ☐ No\*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ☒ Yes ☐ No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? ☐ Yes ☒ No\*

If yes, TSDP Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

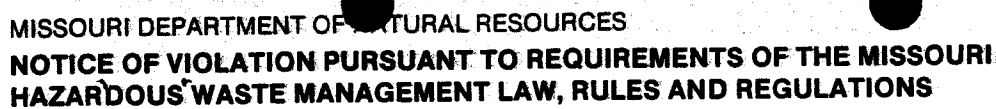
1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ☐ Yes ☒ No

If yes, list type of treatment unit and processes

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If yes, TSDP checklist must be completed.

✓ A potential violation is indicated



FACILITY NAME			
ADDRESS	CITY	STATE	ZIP CODE
MISSOURI ID NUMBER		DATE OF INSPECTION	

During an inspection and/or a review of information or documentation completed this date to determine compliance with the requirements of the Missouri Hazardous Waste Management Law, Section 260.350 - 260.550 PSMo, and/or the Rules and Regulations 10 CSR 25 the following violations were identified. The 40/49 CFR regulations cited below have been adopted by reference in the Missouri Hazardous Waste Regulations.

This information is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order issued pursuant to Section 260.410, RSMo and may not be a complete listing of all violations which may be identified as a result of this inspection.

The owner/operator is hereby requested to submit in writing within 15 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken to: Chief, Enforcement Section, Waste Management Program, Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102 with a copy to the Administrator, \_\_\_\_\_ Regional Office.

The corrective actions taken within 15 days of this notice will be considered in determining whether enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this notice or wish to discuss your response, you may call \_\_\_\_\_  
at \_\_\_\_\_ or \_\_\_\_\_ at \_\_\_\_\_.

Signature of Preparer \_\_\_\_\_ Date \_\_\_\_\_

The undersigned person hereby acknowledges that he/she received a copy of this Notice and has read same.

SIGNATURE <i>Edward C. Pheasant</i>	PRINTED NAME Edward C. Pheasant
TITLE <i>State Auditor</i>	DATE June 16, 1959